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*Attorneys for Defendant Barclays Bank Delaware*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

William H. Ball,

Plaintiff,

v.

BARCLAYCARD  
BARCLAYSUS  
A Delaware corporation,  
Defendant.

Case No. 2:23-cv-02019-JAD-BNW

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME**

**(SECOND REQUEST)**

Pursuant to Fed. R. Civ. P. 6(b) and R IA 6-1, Defendant Barclays Bank Delaware (“Barclays”), by counsel, respectfully requests a twenty-one (21) day enlargement of the time to respond to the Complaint of Plaintiff William H. Ball in this action (“Plaintiff”). Barclays’ response is currently due January 13, 2024 [ECF No. 7]. In support thereof, Defendant states:

1. On November 7, 2023, Plaintiff filed his Complaint in the Eighth Judicial District Court in and for Clark County, Nevada.

2. On November 16, 2023, Barclays was served with the Complaint.

3. On December 7, 2023, Barclays timely removed the action to this Court [ECF No. 1].

4. The undersigned was just recently retained in this action, and requires additional time to investigate all relevant matters, ascertain the veracity of the averments in Plaintiff’s Complaint, analyze and ascertain any and all affirmative and other defenses, and otherwise submit a proper response to the Complaint. In addition, the requested enlargement of time will permit

1 Defendant to identify the account and complete its research. For these reasons, Defendant  
 2 respectfully requests a twenty-one (21) day extension of time -- i.e., through and including February  
 3 5, 2024 -- within which to respond to Plaintiff's Complaint.

4 5. This motion is made in good faith and not for purposes of undue delay. This is  
 5 Defendant's second extension request. No party will be prejudiced by the relief sought.

6 6. Counsel for Barclays conferred with Plaintiff regarding the extension of time  
 7 requested herein, who confirmed that Plaintiff does not oppose the relief sought.

8 WHEREFORE, Defendant Barclays Bank Delaware respectfully requests that the Court  
 9 grant this Unopposed Motion and extend the time for Barclays Bank Delaware to respond to the  
 10 Complaint by and through February 5, 2024.

11 DATED this 12th day of January, 2024.

12  
 13 LEWIS ROCA ROTHGERBER CHRISTIE LLP

14 By: /s/ Brittni A. Tanenbaum

15 J Christopher Jorgensen (SBN: 5382)  
 16 Brittni A. Tanenbaum (SBN: 16013)  
 17 3993 Howard Hughes Parkway, Suite 600  
 18 Las Vegas, NV 89169

19 *Attorneys for Defendant Barclays Bank Delaware*

20  
 21 **ORDER**

22 **IT IS SO ORDERED.**

23  
 24   
 25 UNITED STATES MAGISTRATE JUDGE

26 DATED: 1/16/2024

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I served a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on this 12<sup>th</sup> day of January, 2024, by depositing said copies in the United States Mail, postage prepaid thereon, and via electronic mail upon the following:

William H. Ball  
P.O. Box 90051  
Henderson, Nevada 89009  
951-923-9498  
[Billball49@verizon.net](mailto:Billball49@verizon.net)  
*Plaintiff Pro-se*

/s/ Stella Yuan  
An employee of Lewis Roca Rothgerber Christie